

Baron Aviation Services, Inc.



Rolla National Airport
800 Airport Drive
Vichy, MO 65580

(573) 299-4744 Office
(573) 299-4272 Fax

June 8, 2021

U.S. Department of Transportation
Docket Operations
West Building Ground Floor
Room W12-140
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

DEPARTMENT OF
TRANSPORTATION
2021 JUN 17 A 11:01
DOCKET OPERATIONS

Re: Renewal Exemption No. 17756

To Whom It May Concern:

Baron Aviation Services, Inc., holder of air carrier certificate DEMA159D, seeks the renewal of Exemption No. 17756, Regulatory Docket No. FAA-2018-0105 originally granted March 5, 2018.

The exemption granted our company relief from 14 CFR § 61.51(f) (2) allowing the company to utilize a second-in-command (SIC) pilot for operations not requiring an SIC pilot. Our request was based on a previously granted Exemption 9770 granted to Ameriflight on October 2, 2008.

Our original Exemption 17756 was granted with a termination date of March 31, 2020. Please find copies of the original request letter and exemption enclosed. We request a renewal of this exemption as previously considered and granted. For this reason, Baron Aviation Services requests a finding of good cause be made for waiving publication in the Federal Register.

Thank you for your consideration. Please contact us for any additional information that you may require.

Sincerely,

Steven K. Mason
Director of Operations

Enclosure

Baron Aviation Services, Inc.



Rolla National Airport
800 Airport Drive
Vichy, MO 65580-7231

(573) 299-4744 Office
(573) 299-4272 Fax

January 24, 2018

U.S. Department of Transportation
Docket Operations
West Building Ground Floor
Room W12-140
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

DEPARTMENT OF
TRANSPORTATION
2018 JUN 17 A 11:01
DOCKET OPERATIONS

Re: Exemption Request 14 CFR § 61.51(f) (2)

To Whom It May Concern:

In accordance with Title 14 of the Code of Federal Regulations (14 CFR) § 11.61, Baron Aviation Services, holder of FAA Air Carrier Certificate DEMA159D, petitions the Administrator for relief from 14 CFR § 61.51(f) (2). The regulation states that in order to log time as a second-in-command (SIC) pilot, that pilot must "hold the appropriate category, class, and instrument rating (if required) for the aircraft being flown, and more than one pilot is required under the type certification of the aircraft or the regulations under which the flight is being conducted." The basis for this exemption request is similar to the facts and circumstances underlying Exemption 9770, granted to Ameriflight on October 2, 2008, and recently renewed on January, 13, 2017. (FAA Docket No. FAA-2007-0383, Exemption No. 17205)

Baron Aviation Services is a 14 CFR Part 135 all-cargo operator, conducting on-demand operations in the Cessna 208 Caravan. Operations with this aircraft do not require a type certificate nor do the regulations for our operation require a second pilot. Baron Aviation Services is petitioning the Administrator for an exemption to 14 CFR § 61.51(f) (2) to allow an SIC for our operations even though one is not required by aircraft certification or regulation.

Our petition for this exemption to the regulation serves the public interest. The exemption would create an opportunity for pilots to enter the aviation industry quicker. Pilots participating will be trained in accordance with Baron Aviation's FAA Approved Training Program. The SIC will learn crew resource management in an airline styled environment. As the SIC matures they will be able to take on the role of pilot-in-command earlier helping to fill the current void in the industry today.

Safety will be enhanced by providing the SIC with real world experience under the guidance of an experienced pilot-in-command (PIC). Trained and qualified SICs will also enhance safety in creating an effective crew resource management environment reducing the workload in the cockpit while reinforcing industry accepted standards.

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Consistent with the decision, conditions, and limitations set forth in Exemption 9770, Baron Aviation believes it is in the public interest for pilots to be allowed to log SIC flight time for the sole purpose of upgrading to PIC in a Part 135 operation. Not only will this practice enhance safety but it creates an instructive learning environment allowing the SIC to polish skills needed for advancement in the industry. If granted, this relief would only be exercised in operations within the United States.

The requested relief has already been considered, granted, and renewed for other operators; our request is not controversial or precedent setting. For this reason, Baron Aviation Services requests a finding of good cause be made for waiving publication in the *Federal Register*.

Thank you for your consideration. Please contact us if you require any additional information.

Sincerely,



Steven K. Mason
Director of Operations